

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

SANDRA VILLERS (01)

Criminal No. 3:16-CR-78-N

GOVERNMENT'S RESPONSE TO THE DEFENDANT'S
SENTENCING MEMORANDUM AND MOTION FOR VARIANCE
AND/OR DOWNWARD DEPARTURE

The government respectfully files this response to the defendant's Sentencing Memorandum and Motion for Variance and/or Downward Departure. Dkt No. 108. The defendant has requested that she be given a below guideline. The government believes a guideline sentence is appropriate under the factors set forth in 18 U.S.C. § 3553(a). However, the government would defer to the Court on whether a downward departure or variance is appropriate in this case.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on December 7, 2016, I electronically filed the foregoing document with the clerk for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorney of record who has consented in writing to accept this Notice as service of this document by electronic means.

/s/ Brian D. Poe
BRIAN D. POE
Assistant United States Attorney